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Attorneys for *Specially Appearing* Defendants
 PROPELR MUSIC, LLC; MARRIANI, INC.;
 ANTOINE REED p/k/a “Sir Michael Rocks”;
 and Defendant 10Q LLC

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

TAYLOR D. PENDLETON, an
 individual,

Plaintiff,

v.

10Q LLC, a California Limited Liability
 Company; PROPELR MUSIC, LLC, an
 Illinois Limited Liability Company;
 MARRIANI, INC., an Illinois
 corporation; ANTOINE REED p/k/a “Sir
 Michael Rocks,” an individual; and DOES
 1 through 100, inclusive,

Defendants.

Case No. 2:22-cv-04806-RGK-PVC

Judge: Hon. R. Gary Klausner

***SPECIALLY APPEARING
 DEFENDANTS PROPELR MUSIC,
 LLC, MARRIANI, INC. AND
 ANTOINE REED’S NOTICE OF
 MOTION AND MOTION TO
 DISMISS FOR LACK OF
 PERSONAL JURISDICTION
 PURSUANT TO FED R. CIV. P.
 12(b)(2)***

Filed concurrently herewith:

- (1) Memorandum of Points & Authorities
- (2) Declaration of Eduardo Martorell
- (3) Declaration of Antoine Reed
- (4) Declaration of Josh Kaplan
- (5) Request for Judicial Notice
- (6) [Proposed] Order

Hearing Date: January 23, 2023

Time: 9:00 a.m.

Action filed: July 13, 2022

NOTICE OF MOTION AND MOTION TO DISMISS UNDER RULE 12(b)(2)

Please take notice that on January 23, 2023, at 9:00 a.m., or as soon thereafter as the matter parties may be heard, in the Courtroom of Honorable R. Gary Klausner, Courtroom 850 on the 8th Floor of the Roybal Federal Building and U.S. Courthouse, located at 255 East Temple Street., Los Angeles, CA 90012. *Specially Appearing* Defendants PROPELR MUSIC, LLC (“PROPELR”), an Illinois Limited Liability Company; MARRIANI, INC. (“MARRIANI”), an Illinois corporation; ANTOINE REED p/k/a “Sir Michael Rocks,” (“REED”) an individual residing in Illinois (collectively, the “Illinois Defendants”), hereby make this *special appearance*, requesting this Court to dismiss Plaintiff Taylor D. Pendleton’s (“Plaintiff”) Complaint against the Illinois Defendants for lack of personal jurisdiction.

This motion is based upon the accompanying Memorandum of Points and Authorities, the Request for Judicial Notice, the declarations submitted therewith, all documents in the Court’s file, and such other written and oral arguments and evidence as may be presented to the Court. This Motion is also made following the telephonic conference of counsel for parties pursuant to Local Rule 7-3, which took place on December 16, 2022. (*See* Declaration of Eduardo Martorell (“Martorell Decl.”), ¶¶ 2-5.)

Dated: December 23, 2022

MARTORELL LAW APC

By: /s/ Eduardo Martorell

Eduardo Martorell

Jordan M. Zim

Attorneys for *Specially Appearing*
Defendants PROPELR MUSIC, LLC;
MARRIANI, INC.; ANTOINE REED p/k/a
“Sir Michael Rocks”; and Defendant
10Q LLC